Charles W. Hingle, #1947 Shane P. Coleman, #3417 Jason S. Ritchie, #7442 HOLLAND & HART LLP 401 North 31st Street Suite 1500 P.O. Box 639 Billings, Montana 59103-0639 Telephone: (406) 252-2166

Fax: (406) 252-1669

Attorneys for Hyundai Motor Finance Co.

UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF MONTANA

INCREDIBLE AUTO SALES, LLC)	Bankruptey No.06-60855-RBK
)	
Debtor,)	
)	•

STIPULATION TO CONTINUE NOVEMBER 1, 2006 HEARINGS AND JOINT MOTION FOR OTHER RELIEF

INCREDIBLE AUTO SALES, LLC ("Debtor"), and HYUNDAI MOTOR FINANCE COMPANY ("HMFC"), through their undersigned counsel, stipulate and agree to continue (a) Debtor's Emergency Motion as to Use of Cash Collateral Pursuant to 11 USC Section 363 of the Bankruptcy Code and as to Offer of Adequate Protection to Hyundai Motor Finance Company, and (b) Emergency Motion to Prohibit or Condition Use, Sale or Lease of Inventory and/or Cash Collateral and Notice Thereof, both dated October 26, 2006 (the "Motions"), and scheduled for hearings on November 1, 2006, in Billings, Montana. The parties further represent they are actively engaged in negotiation of an agreement regarding use of cash collateral during the pendency of this case and other matters.

The parties further move the Court for an Order setting hearings on the Motions on the next available date in Billings, Montana, and for other relief as follows:

- 1. Debtor shall, until further order of this Court, deposit the proceeds of the sales of all inventory of new and used motor vehicles and parts in trust accounts established at Stockman Bank, Billings, Montana, and provide HMFC with statements on each such account by electronic mail or facsimile on a daily basis; and
- 2. Debtor shall, until further order of this Court, allow HMFC access during regular business hours to its places of business so that HMFC may inspect all inventory of new and used motor vehicles, as well as the books and records related thereto.

DATED this 31st day of October, 2006

William L. Needler

William L. Needler

William L. Needler and Associates

\$55 Skokie Blvd., Suite \$00

Northbrook, IL 60062

Counsel for Debtor

/s/ Charles W. Hingle

Charles W. Hingle Holland & Hart w

401 North 31st Street

Suite 1500

P.Q. Box 639

Billings, Montana 59103-0639

Counsel for HMFC

CERTIFICATE OF SERVICE

the foregoing, addressed as follows and by the method shown below:

I hereby certify that on this 31st day of October, 2006, I served a true and correct copy of

William L. Needler P.O. Box 177 Fuller Building Suite H 2 North Spruce Street Ogallala NE 69153 williamlneedler@aol.com	[] [X] []	U.S. Mail, postage prepaid Electronic service Overnight Delivery
Clarke B. Rice Clark B. Rice, P.C. 2951 King Avenue West Billings, MT 59102	[X] []	U.S. Mail, postage prepaid Electronic service Overnight Delivery
Office of the U.S. Trustee U.S. Trustee's Office Liberty Center Suite 204 301 Central Avenue Great Falls MT 59401	[] [X] []	U.S. Mail, postage prepaid Electronic service Overnight Delivery
Bruce F. Fain Murphy, Kirkpatrick & Fain, P.L.L.P. 208 North Broadway, Suite 208 P.O. Box 429 Billings, MT 59103-0429 bruce@murphkirk.com	[] [X] []	U.S. Mail, postage prepaid Electronic service Overnight Delivery
Christopher P. Birkle Lovell Law Firm, P.C. 175 North 27th Street, Suite 1206 P.O. Box 1415 Billings, MT 59101 cbirkle@lovellaw.com	[] [X]	U.S. Mail, postage prepaid Electronic service Overnight Delivery
James A. Patten Patten, Peterman, Bekkedahl & Green, P.L.L.C. 2817 2nd Avenue North, Suite 300 Billings, MT 59101 japatten@ppbglaw.com	[] [X] []	U.S. Mail, postage prepaid Electronic service Overnight Delivery

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